

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Telecommunications Relay Services and)	CC Docket No. 98-67
Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	CG Docket No. 03-123
Disabilities)	
)	
American with Disabilities Act of 1990)	

**AT&T INTERIM REPORT ON
VRS EMERGENCY CALL HANDLING WAIVER**

Pursuant to the *January 12 Request* from the Chief of the Disability Rights Office (“DRO”) of the Consumer & Governmental Affairs Bureau,¹ AT&T Corp. (“AT&T”) submits this interim report regarding the progress made in providing emergency call handling for Video Relay Service (“VRS”).

In its *2004 TRS Report and Order*,² the Commission extended until January 1, 2006 the waiver that it had previously granted to VRS providers for providing that service in accordance with the Commission’s mandatory minimum standards for emergency call handling.³ The waiver extension was made subject to periodic reporting

¹ See email dated January 12, 2005 to VRS providers from Thomas Chandler, Chief, Disability Rights Office, Consumer & Governmental Affairs Bureau, FCC (“*January 12 Request*”).

² See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, CC Docket No. 98-67 and CG Docket No. 03-123, FCC 04-137 (“*2004 TRS Report and Order*”) (rel. June 30, 2004).

³ See *id.*, ¶ 111, *extending waiver granted in Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, CC Docket No. 98-67, DA 01-3029 (rel. Dec. 31, 2001) (“*VRS Waiver Order*”). The *VRS Waiver Order* had originally provided for such relief to and including December 31, 2003. *Id.*, ¶¶ 22.

requirements, and the next such report is due April 16, 2005.⁴ The DRO's *January 12 Request* asks VRS providers to submit an additional interim report addressing the factors set forth in the *2004 TRS Report and Order*.

As AT&T showed in its *April 2004 Report* regarding waivers granted for telecommunications relay service ("TRS"),⁵ the processing of VRS emergency calls via the Internet is affected by the limitations of the current technology which does not make it possible to determine the VRS caller's geographic location in order to automatically route the emergency call to the appropriate public safety answer point ("PSAP"). This is the same technical limitation that prevents the automatic routing to the appropriate PSAP of emergency calls originated using Internet Protocol ("IP") Relay.

Without the ability to automatically capture automatic number identification ("ANI") for any caller who initiates any type of a relay call (either IP or VRS) via the Internet, a relay provider is unable to automatically pass the ANI to the most appropriate PSAP. Thus, there does not yet appear to be an industry wide solution that would enable any VRS provider to be able to handle requests for emergency call handling in the manner required for traditional TRS calls.⁶ AT&T showed in its *April 2004 Report* that a development and deployment of a database containing the requisite

⁴ See *2004 TRS Report and Order*, ¶ 118 and Appendix E.

⁵ See AT&T Report on TRS Waivers, at 7, filed April 16, 2004 in *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Americans with Disabilities Act 1990*, CC Docket No. 98-67 and CG Docket No. 03-213 ("AT&T April 2004 Report").

⁶ *Id.* at 5, 7.

information to allow VRS providers to determine an emergency caller's geographic location in real time will require approximately two years.⁷

In the interim, and until an industry wide solution can be technically and economically developed, AT&T VRS interpreters will respond to a VRS caller's request to connect to an emergency agency by obtaining the caller's location information on a real time basis directly from the customer and then providing this information verbally to the emergency agency. Additionally, AT&T will continue to prominently post a message on its VRS website reminding customers not to use VRS for emergency 911 calls.

For these reasons, AT&T urges the Commission to extend the VRS emergency call handling waiver so that it expires on January 1, 2008, the same date as the waiver for emergency call handling of IP Relay calls.

Respectfully submitted,

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⁷ *Id.* at 7. As AT&T also showed there (*id.* at 5-6), requiring IP Relay users to employ a subscription or log-in process would, in addition to requiring a substantial commitment of resources by providers, be dependent upon customer cooperation to provide the necessary caller-specific information to allow correct routing of emergency traffic. These same considerations apply to VRS emergency calling as well.